

# EXHIBIT D

1  
2  
3  
4  
5  
6  
7  
8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
10

11 People of the State of California, et al.

MDL No. 3047

12 v.

Case Nos. 4:23-cv-05448-YGR

13 Meta Platforms, Inc.; Instagram, LLC; Meta  
14 Payments, Inc.; Meta Platforms Technologies,  
15 LLC,

**DECLARATION OF KELI ACQUARO  
REGARDING UNDUE BURDENS FOR  
STATE OF HAWAII DEPARTMENT OF  
HEALTH CHILD & ADOLESCENT  
MENTAL HEALTH DIVISION**

16 IN RE: SOCIAL MEDIA ADOLESCENT  
17 ADDICTION/PERSONAL INJURY  
18 PRODUCTS LIABILITY LITIGATION THIS  
19 DOCUMENT RELATES TO:

Judge: Hon. Yvonne Gonzalez Rogers

4:23-cv-05448

Magistrate Judge: Hon. Peter H. Kang

20  
21 I, Keli Acquaro, hereby declare and state as follows:

22 1. I am the administrator for the Child & Adolescent Mental Health Division  
23 ("CAMHD") of the State of Hawaii's Department of Health.

24 2. I make this declaration based on personal knowledge.

25 3. CAMHD provides mental health services to eligible children and youth with  
26 severe emotional and/or behavioral challenges.

27 4. Defendant Meta Platforms, Inc.'s ("Meta") deposition topics, particularly topics 1-  
28

1 6 in Meta's amended Rule 30(b)(6) deposition notice, dated January 21, 2025, impose an undue  
2 burden on CAMHD due to the scope of the request and CAMHD's present circumstances.

3 5. CAMHD is currently facing a staffing shortage, with approximately 20% of its 200  
4 positions needing to be filled.

5 6. My understanding is that the Department's vacancy rate is even higher at around  
6 30%.

7 7. CAMHD is also actively involved in Hawaii's Legislative Session, which runs  
8 from January to May every year and requires dedicated time and resources.

9 8. CAMHD's ongoing duties to provide mental health services throughout the State,  
10 combined with the current lack of staff and the demands of the legislative session, creates an  
11 especially challenging situation for CAMHD to prepare a deponent to adequately testify as to the  
12 State's activities over an extensive 12-year period, as identified by Meta.

13 9. Moreover, CAMHD does not organize records of its activities (i.e., programs,  
14 initiatives, efforts, or actions) or communications in a way that is compatible with the deposition  
15 topics, so gathering information responsive to the topics will require substantial time and  
16 resources that CAMHD presently lacks.

17 10. CAMHD also maintains its own social media handles separately from Department,  
18 which may require separate testimony.

19 I declare under penalty of perjury under the laws of the United States of America that the  
20 foregoing is true and correct.

21 Executed on March 17, 2025, in Honolulu, Hawai'i.

22  
23 

24 \_\_\_\_\_  
25 Keli Acquaro  
26  
27  
28